

U.S. Serial No. 10/751,607

REMARKS

1. After entry of this paper, claims 21-38 are pending in the application.

Reconsideration of this application is respectfully requested.

2. Claims 1, 2 and 4-12 stand rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement, because the limitation "non-circular" which modifies the term "pads," adds new matter.

This rejection is moot, as claims 1, 2 and 4-12 have been cancelled herein and replaced with new claims 21-38, which do not recite the "non-circular" limitation.

In view of the foregoing, withdrawal of this rejection is respectfully requested.

- 3.. Claim 11 stands objected to under 37 CFR 1.75 as being a substantial duplicate of claim 4.

Claim 11 has been cancelled herein. Accordingly, withdrawal of this objection is respectfully requested.

4. Claims 1, 2, 4, 7, and 11 stand finally rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 4,164,678 to Biazzo et al. (Biazzo). Claims 1, 2, 4, 7, 11, and

U.S. Serial No. 10/751,607

12 stand finally rejected under 35 U.S.C. 102(b) as being anticipated by Applicants' admitted Prior Art Figure 5 (Figure 5). Claims 5, 6, and 8-10 stand finally rejected under 35 U.S.C. 103(a) as being unpatentable over Biazzo as applied to claim 1.

Claims 1, 2 and 4-12 have been cancelled and replace with claims 21-38 which are directed to an electrode for a plasma display panel.

Claims 21-26 require inter alia, "... at least one pad connected with the at least one bus line conductor, the at least one pad including opposing side sections that point away from one another."

Claims 27-33 require inter alia, "... the at least one pad including opposing side sections, each of the side sections having a blunted triangular shape, the side sections tapering away from an interior portion of the at least one pad."

Claims 34-36 require inter alia, "... at least one pad connected with the at least one bus line conductor, the at least one pad having an oval shape."

Claims 37-38 require inter alia, "... at least one pad including tapering end sections and a bulging inner section, one of the tapering end sections connected with the at least one bus line conductor."

The electrodes recited in claims 21-38 provide an intersection structure at the bus line conductor and the pad, which avoids the electrode breakage associated with prior art electrode structures. (See for example, paragraphs [0031], [0032], [0033], [0034], and [0035] of the present application.)

U.S. Serial No. 10/751,607

Biazzo and Figure 5 each fail to expressly or inherently describe the electrode structures recited in claims 21-38. Biazzo merely describes a circular or round pad. Figure 5 merely shows a rectangular pad with rounded off corners.

Accordingly, neither Biazzo nor Figure 5 anticipate the subject matter of claims 21-38.

Under 35 U.S.C. 103(a), a claim is unpatentable for obviousness when the "subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which the subject matter pertains." Whether the subject matter of a claim is obviousness is based on the following factual inquiries: (1) the scope and content of the prior art; (2) the level of ordinary skill in the art; (3) the differences between the prior art and the claimed invention; and (4) the extent of any objective indicia of non-obviousness. Graham v. John Deere Co., 383 U.S. 1, 17-18 (1966).

According to the MPEP, in order to establish a prima facie case of obviousness, the Examiner has the initial burden of establishing, with factual support, three basic criteria:

(1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings; (2) a reasonable expectation of success; and (3) the prior art reference (or references when combined) and not the Applicant's disclosure must teach or suggest all the claim limitations. MPEP 2142. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the [E]xaminer must present a

U.S. Serial No. 10/751,607

convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985).

Neither Biazzo nor Figure 5 arrive at the electrode structures of claims 21-38, which avoid the electrode breakage associated with prior art electrode structures. Moreover, there is no suggestion or motivation in either Biazzo, Figure 5, or in the knowledge generally available to one of ordinary skill in the art to modify Biazzo or Figure 5, or to combine Biazzo and Figure 5, to arrive at the subject matter of claims 21-38.

In addition, Biazzo actually suggests that it would be undesirable to modify the shape of the round pads, stating that the pads should be round to ensure that discharges occur at corresponding points on each pad (see column 6, lines 6-10 of Biazzo). Hence, claims 21-38 are patentable over Biazzo, Figure 5, or Biazzo and Figure 5.

In view of the foregoing, withdrawal of this rejection is respectfully urged.

5. Favorable reconsideration of this application is respectfully requested as it is believed that all outstanding issues have been addressed herein and, further, that claims 21-38 are in condition for allowance. Should there be any questions or matters whose resolution may be advanced by a telephone call, the examiner is cordially invited to contact Applicants' undersigned attorney at his number listed below.

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U.S. Serial No. 10/751,607

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6. The Commissioner is hereby authorized to charge payment of any additional filing fees required under 37 CFR 1.16 and any patent application processing fees under 37 CFR 1.17, which are associated with this paper, or credit any overpayment to Deposit Account No. 04-1679.

Respectfully submitted,



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PAUL A. SCHWARZ
Registration No. 37,577
Attorney for Applicants

DUANE MORRIS LLP
P.O. Box 5203
Princeton, NJ 08543-5203
Direct Telephone: 609.631.2446
Facsimile: 609.631.2401
paschwarz@duanemorris.com